

TRULINCS 67795054 - COSME, WILLIAM R - Unit: BRO-H-B

FROM: 67795054
TO: Cullen, Keito; Joh, Cosme; Sheks, Akseks
SUBJECT: EXTENSION ON PSI
DATE: 05/29/2017 02:30:15 PM

please forward to Mark DeMarco esq. asap and fax to JUDGE PRESKA LAP ASAP:

CASE 13CR43 USA v. WILLIAM R. COSME

RE: (30) Day EXTENSION OF TIME FOR PSI

Greetings Mr. DeMarco,

In light of the holidays and my not receiving legal mails, dockets, legal emails in time. I propose we ask Judge Preksa for (30) days before PSI. As of now we only have till June 2, 2017.

I interviewed Elizabeth Macedonia to handle PSI, sentencing litigation today and will again meet with K&L gates tomorrow, Tuesday for all the other issues pre PSI and follow up with Macedonia this week as we had discussed.

Either way, I and the lawyers need more time to understand the entirety of the docket, events, PSI issues, other motion ISSUES, LEGAL defects, preservation of issues to appeal as required.

29(c) - I/we will also need ample time to file a REPLY to your 29(c) and 33 and I expected a opposition to my 29(c) 33 and ample time to REPLY.

FINAL FORFEITURE - I also do not see the LAP DENIAL of the PRELIMINARY and FINAL FORFEITURE motions I filed that you claimed occurred in court last, please provide date, docket number LAP denied the FINAL FORFEITURE MOTION I filed.

FYI, as discussed Congress does not authorize FORFEITURE upon a WIRE FRAUD that does not "affect a financial institution" pursuant to 18 U.S.C. 982 as I mentioned to you in our meetings prior and briefed, filed. Nor can a PSI, PSR be done prior to the FORFEITURE HEARING assuming the forfeiture was valid, which it is not...also note RULE 32.2, take a look at my forfeiture motion, please advise.

Additionally, I will file NOTICES OF APPEAL on the 6th AMENDMENT argument, motion denied and the 29(c) you filed. But a REPLY ought to be filed UPON your 29(c) by us working together on it until you are out. ALL critical motions, oppositions need REPLY, oral argument from the defense.

TIME IS OF THE ESSENCE

Best Regards,

/S/ WILLIAM R. COSME

WILLIAM R. COSME - REG. NO 677950-54

Cc: LAP, OPR, OIG, AUSA BELL, snail mailed, faxed to LAP, DeMarco, AUSA Bell